

## **REMARKS**

In the Office Action mailed January 6, 2009<sup>1</sup>, the Examiner objected to claims 1, 2, 11, 12, and 21; rejected claims 1, 2, 11, 12, and 21 under 35 U.S.C. § 102(a) as being anticipated by McLaughlin, "Java and XML Data Binding" ("*McLaughlin*"); and rejected claims 22-25 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0007009 to Haley ("*Haley*").

By this amendment, Applicants have amended claims 1, 11, 21, 23, and 24, added new claims 26-29, and canceled claims 2, 5-10, 12, 15-20, 22, and 25 without prejudice or disclaimer. Claims 1, 11, 21, 23, 24, and 26-29 are pending and under current examination.

### **I. The Objection to Claims 1, 2, 11, 12, and 21**

With respect to claims 1, 11, and 21, the Office Action suggests several helpful changes to these claims (Office Action at p. 2). Applicants have incorporated the suggested changes, and respectfully request that the Examiner withdraw the objection to claims 1, 11, and 21.

Claims 2 and 12 have been canceled, rendering the objection moot with respect to these claims.

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<sup>1</sup> The Office Action may contain statements characterizing the related art, case law, and claims. Regardless of whether any such statements are specifically identified herein, Applicants decline to automatically subscribe to any statements in the Office Action.

**II. The Rejection of Claims 1, 2, 11, 12, and 21 under 35 U.S.C. § 102(a)**

Applicants traverse the rejection of claims 1, 2, 11, 12, and 21 under 35 U.S.C. § 102(a) for at least the following reasons. Claims 2 and 12 have been canceled, rendering the rejection moot with respect to these claims.

*McLaughlin* does not disclose, or even suggest, each and every element of the rejected claims. Claim 1, for example, recites a method for validating programs, the method comprising “performing usage checks on the script code section by extracting language elements from the generated script code section and comparing the extracted language elements with the meta-language definition module used to generate the language-dependent program” (emphasis added).

*McLaughlin* discloses generating classes by converting XML into a set of Java source files (*McLaughlin*, Chapter 3, page 1). *McLaughlin*’s classes are generated by creating a set of XML constraints along with a binding schema, and providing the XML constraints and binding schema to a class generation “black box” such as JAXB (*McLaughlin*, Chapter 3, pages 1-2). However, *McLaughlin* does not teach or suggest generating script code, or extracting language elements from script code. Indeed, the Office Action concedes that *McLaughlin* does not disclose a script code section (Office Action at page 5). Therefore, *McLaughlin* does not teach or suggest “performing usage checks on the script code section by extracting language elements from the generated script code section and comparing the extracted language elements with the meta-language definition module used to generate the language-dependent program,” as recited by independent claim 1 (emphasis added).

Accordingly, *McLaughlin* cannot anticipate or even render obvious independent claim 1. Independent claims 11 and 21, although of different scope than claim 1, recite elements similar to the elements recited by claim 1. Applicants therefore respectfully request the Examiner to withdraw the rejection of claims 1, 11, and 21 under 35 U.S.C. § 102(a) as being anticipated by *McLaughlin* and allow these claims.

**III. The Rejection of Claims 22-25 under 35 U.S.C. § 103(a)**

Claims 22 and 25 have been canceled, rendering the rejection moot with respect to these claims. Claims 23 and 24 depend from claim 1. As discussed, *McLaughlin* fails to disclose or suggest “performing usage checks on the script code section by extracting language elements from the generated script code section and comparing the extracted language elements with the meta-language definition module used to generate the language-dependent program,” as recited by independent claim 1 (emphasis added).

*Haley* discloses a processing system for linking data items with corresponding prompt elements of a user display, using a “binding database” (*Haley*, abstract). *Haley*’s processing system includes JavaScript code that binds XML data items received from a server to controls in a form (*Haley*, ¶ 31). The JavaScript code can be incorporated into HTML code to cause a personal computer to obtain data items from a server machine when the form loads (*Haley*, ¶ 42). For example, the JavaScript may include subroutines that transfer data between data items in the XML code to associated elements in the form (*Haley*, ¶ 54).

The Office Action relies on *Haley*'s JavaScript code as allegedly corresponding to the claimed script code (Office Action at page 5). However, claim 1 recites "extracting language elements from the generated script code" (emphasis added). At best, *Haley*'s processing system extracts data by executing script code such as JavaScript. However, *Haley* does not teach or suggest extracting language elements from the JavaScript code itself. Therefore, *Haley* also does not teach or suggest "performing usage checks on the script code section by extracting language elements from the generated script code section and comparing the extracted language elements with the meta-language definition module used to generate the language-dependent program," as recited by independent claim 1 (emphasis added).

For the reasons discussed above, claims 23 and 24 are allowable over the cited references, at least due to their dependence from allowable base claims.

Dependent claim 23 is further distinguishable from the cited references. Claim 23 recites a method comprising "generating a compiler language representation of the script code section, the compiler language representation of the script code section comprising a second interface and a second class" (emphasis added). *Haley* discloses an event handler that uses generic binding routines to move data to an XML document, and these routines can be implemented in JavaScript (*Haley*, ¶ 74). The Office Action relies on these constraints in addressing claim 23 (Office Action at page 6, citing *Haley* ¶ 74). However, *Haley* does not disclose generating a compiler-language representation of the JavaScript routines. Therefore, *Haley* does not teach or suggest "generating a compiler language representation of the script code section, the compiler

language representation of the script code section comprising a second interface and a second class,” as recited by dependent claim 23 (emphasis added). *McLaughlin* fails to cure these deficiencies of *Haley*.

Dependent claim 24 is further distinguishable from *Haley*. Claim 24 recites a method comprising “performing usage and semantic checks on the script code section by compiling the compiler language representation of the script code section, including the generated second interface and the generated second class” (emphasis added). As discussed, *Haley* discloses that certain routines for operating on XML code may be implemented in JavaScript (*Haley*, ¶ 74). The Office Action relies on these constraints in addressing claim 24 (Office Action at page 6, citing *Haley* ¶ 74). However, *Haley* does not disclose compiling the JavaScript routines or a representation of the JavaScript routines. Therefore, *Haley* does not teach or suggest “performing usage and semantic checks on the script code section by compiling the compiler language representation of the script code section, including the generated second interface and the generated second class,” as recited by dependent claim 24 (emphasis added). *McLaughlin* fails to cure these deficiencies of *Haley*.

#### **IV. New Dependent Claims 26-29**

New claims 26 and 27 are allowable at least due to their dependence from allowable claim 11, and new claims 28 and 29 are allowable at least due to their dependence from allowable claim 21. Further, claims 26 and 28 are allowable for similar reasons to those discussed above with respect to dependent claim 23, and

claims 27 and 29 are allowable for similar reasons to those discussed above with respect to dependent claim 24.

**V. Conclusion**

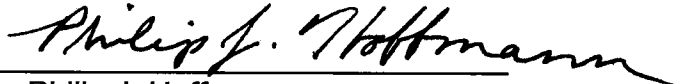
In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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